## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

CITIZENS FOR CONSUMER JUSTICE, et al.	)				
	)				
Plaintiffs,	)				
	)		D,C	2	
<b>v.</b>	)		Siss	2002	Z
	)		R C		<u>.</u> 은
	)	Civil Action No.	: 055-422	257建B	BS 📺 🗝
ABBOTT LABORATORIES, INC.,	)		722	25	- <del>2</del> 2=
et al.	)		77	0,	ν <sub>i</sub> π
	ĺ		30	U	걸ㅁ
Defendants.	Ś		COUR MASS.	<del></del>	OFFICE
	,		.S.P.	i.i	CE
			, '	Ωį	• • •

## JOINT MOTION FOR STIPULATED ORDER ENLARGING TIME FOR DEFENDANT BAXTER TO RESPOND TO COMPLAINT

Plaintiffs Citizens for Consumer Justice, Colorado Progressive Coalition, Congress of California Seniors, Florida Alliance for Retired Americans, Health Care for All, Inc., Massachusetts Senior Action Council, MassPIRG, Minnesota Senior Federation, New Jersey Citizen Action, New York State Wide Senior Action Council, Pennsylvania Alliance for Retired Americans, Vermont Public Interest Research Group, West Virginia Citizen Action, and Wisconsin Citizen Action (collectively, "Plaintiffs") and defendant Baxter International, Inc. ("Baxter") hereby jointly move that the time within which Baxter must timely move, answer or otherwise respond to the original Complaint filed by Plaintiffs in the above-entitled action be enlarged to and including March 21, 2002. As grounds therefor, the parties represent that plaintiffs have alleged in their 41-paged original Complaint numerous and complex federal claims against 29 separate defendants. Baxter respectfully requests further time to study and respond appropriately to the original Complaint.

Aonor A EXTENS 10A 20-82

Plaintiffs represent that Baxter's request is not unreasonable and, accordingly, join in this motion.

A Stipulated Order is attached hereto for the Court's convenience.

## Respectfully submitted,

CITIZENS FOR CONSUMER JUSTICE,
COLORADO PROGRESSIVE COALITION,
CONGRESS OF CALIFORNIA SENIORS,
FLORIDA ALLIANCE FOR RETIRED
AMERICANS, HEALTH CARE FOR ALL, INC.,
MASSACHUSETTS SENIOR ACTION COUNCIL,
MASSPIRG, MINNESOTA SENIOR FEDERATION,
NEW JERSEY CITIZEN ACTION, NEW YORK
STATE WIDE SENIOR ACTION COUNCIL,
PENNSYLVANIA ALLIANCE FOR RETIRED
AMERICANS, VERMONT PUBLIC INTEREST
RESEARCH GROUP, WEST VIRGINIA CITIZEN
ACTION, and WISCONSIN CITIZEN ACTION

By their Counsel,

Thomas M. Sobol (TMS 471770)
Nicole Y. Brumsted (NYB 3557)
Lieff Cabraser Heimann & Bernstein, LLP
175 Federal Street, 7<sup>th</sup> Floor
Boston, MA 02110
(617) 720-5000 (Phone)
(617) 720-5015 (Fax)

Michael J. Flannery Carey & Davis, LLC 676 North Michigan Avenue Suite 3110 Chicago IL 60611 (312) 649-0100 (Phone) (312) 649-0603 (Fax)

David J. Bershad
J. Douglas Richards
Michael M. Buchman
Milberg Weiss Bershad Hynes & Lerach, LLP
One Pennsylvania Plaza
New York, NY 10119
(212) 594-5300 (Phone)
(212) 868-1229 (Fax)

Respectfully submitted,

BAXTER INTERNATIONAL, INC.

L/V, (/(

By their counsel

Peter E. Gelhaar, BBO#188310 Robert L. Arendell, BBO#638631 Karen A. Pickett, BBO#633801 Donnelly, Conroy & Gelhaar, LLP 73 Tremont Street Boston, MA 02108 (617) 720-2880

## OF COUNSEL:

Merle DeLancey
J. Andrew Jackson
Dickstein, Shapiro, Morin &
Oshinsky, LLP
2101 L Street, N.W.
Washington, D.C. 20037
(202) 785-9700

Robert G. Eisler Lieff Cabraser Heimann & Bernstein, LLP 780 Third Avenue, 48th Floor New York, NY 10017 (212) 355-9500 (Phone) (212) 355-9592 (Fax)

**CERTIFICATE OF SERVICE** 

hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by mail/by hand

Date: